

HONORABLE JUDGE DAVID G. ESTUDILLO

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

JOJO DEOGRACIAS EJONGA,

Plaintiff,

v.

ALEX WATANABE,

Defendant.

NO. 2:21-cv-01004-DGE

STIPULATED MOTION AND
ORDER OF DISMISSAL WITH
PREJUDICE

I. STIPULATED MOTION TO DISMISS

Plaintiff, by and through his attorneys, and Defendant, by and through her attorneys, hereby move the Court for entry of the attached Agreed Order of Dismissal, dismissing Plaintiffs' Amended Complaint with prejudice and providing additional relief in accordance with the parties' Release and Settlement Agreement, attached hereto as **Exhibit 1**. As grounds thereof, Plaintiff and Defendant state that they have mutually agreed to a resolution of this matter.

WHEREFORE, the parties pray for an order granting the relief requested herein.

Respectfully Submitted this 13th day of January, 2025.

s/ Aaron Williams

AARON WILLIAMS, WSBA #46044

SEAN BRITTAIN, WSBA #36804

Assistant Attorneys General

Aaron.Williams@atg.wa.gov

Sean.Brittain@atg.wa.gov

Attorneys for Defendant

s/ Brennen Johnson

BRENNEN JOHNSON, WSBA #51665

KATHLEEN CRADDOCK, WSBA #54655

brennen@demaineseberger.com

kate@demaineseberger.com

Attorneys for Plaintiff

II. AGREED ORDER OF DISMISSAL

The parties hereby agree that this case has been settled and that all issues and controversies have been resolved to their mutual satisfaction. The parties request the Court to enter an order of dismissal in accordance with the terms of their Release and Settlement Agreement.

IT IS HEREBY ORDERED:

1. The parties' stipulated motion for an order of dismissal is **GRANTED**; and
2. This case is dismissed, with prejudice. The Clerk shall close the case.

DATED this 14th day of January, 2025.



David G. Estudillo
United States District Judge